

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:	*
IVETTE PEREZ DE JESUS	* CASE NO. 16-04096 BKT
Debtor(s)	* CHAPTER 13

FIRST BANK PUERTO RICO	* INDEX
Movant	*
IVETTE PEREZ DE JESUS,	*
JOSE RAMON CARRION MORALES,	*
CHAPTER 13 TRUSTEE TRUSTEE	*
Respondent (s)	*

DEBTOR'S RESPONSE TO
MOTION FOR RELIEF FROM STAY PURSUANT TO 11 U.S.C. 362
DOCKET NO. 42

TO THE HONORABLE COURT:

NOW COMES, IVETTE PEREZ DE JESUS, the Debtor, through the undersigned attorney, and very respectfully states and prays as follows:

1. On March 22, 2019, First Bank Puerto Rico ("First Bank") filed a motion requesting that stay be lifted in the present bankruptcy case, Docket No. 42, basically alleging that the Debtor is in arrears in the post-petition direct mortgage loan payments to said creditor in the sum of \$2,376.89, including late charges, legal fees and costs for the present Index.

2. The Debtor respectfully states that the Debtor made recent payments to the mortgage loan with First Bank, however, the same were applied to previous months in arrears and that it appears that the Debtor owes First Bank mortgage loan payments

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corresponding to the months of February, March and now April/2019.

3. The Debtor respectfully states that the Debtor paid (attached is evidence of payments) the recent following direct post-petition mortgage loan payments to First Bank:

---December 05, 2018	\$458.54
---January 12, 2019	\$458.54
---February 21, 2019	\$458.54
---March 23, 2019	\$458.54

4. That on April 01, 2019 the Debtor requested First Bank to issue an "account history report" in order to determine where and how were the abovementioned mortgage loan payments credited to the Debtor's mortgage loan account with First Bank.

5. Notwithstanding, on April 01, 2019, the Debtor paid First Bank the following payments:

---April 01, 2019	\$458.54
<u>---April 01, 2019</u>	<u>\$458.54</u>

Total paid: \$917.08 (attached is evidence of payments).

6. That the sum of \$2,376.89 claimed by First Bank in its 362 motion for post-petition arrears was reduced by the aforestated 04/01/2019 payments (\$917.08) and that the Debtor proposes to pay the balance owed to First Bank, pending the application of the above described post-petition payments made in December/2018, January/February and March/2019, within the next forty-five (45) days.

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7. Therefore, the Debtor respectfully requests this Court grant the Debtor an extension of time within to cure the aforementioned balance on the post-petition mortgage loan arrears of forty-five (45) days. This extension of time to expire on May 20, 2019.

WHEREFORE, the Debtor respectfully requests from this Honorable Court to grant the present response, grant the requested extension of time within to pay the balance on the post-petition mortgage loan arrears, and upon informing the Court of said payment, deny First Bank's motion requesting relief from the automatic stay, Docket No. 42, in the above captioned case.

I CERTIFY that on this same date a copy of this motion was filed with the Clerk of the Court using the CM/ECF filing system, which will send notification of same to: the Chapter 13 Trustee, Jose Ramon Carrion Morales, Esq.; Patricia I. Varela Harrison, Esq., *Martinez & Torres Law Offices, PSC*, Counsel for First Bank PR; I also certify that a copy of this motion was sent via regular mail to the Debtor/Respondent Ivette Perez De Jesus, New Center Plaza 210 Jose OLivera 510 San Juan PR 00918.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, 3rd day of April, 2018.

/s/Roberto Figueroa Carrasquillo

USDC #203614

RFIGUEROA CARRASQUILLO LAW OFFICE PSC

ATTORNEY FOR DEBTOR/RESPONDENT

PO BOX 186 CAGUAS PR 00726-0186

TEL NO 787-744-7699 FAX NO 787-746-5294

Email: rfigueroa@rfclawpr.com

Date Time Transaction
12/08/2018 14:57:00 0124
ML Payment
0000154473 \$458.54

Effective Date:

Detail:
CASH \$0.00
CHECK \$0.00
XFER \$458.54
SOF 037 - 3701867499
FWD \$0.00
OUT \$0.00

Thank you,

CRISTIAN - 09401
Conozca los Beneficios de la
Cuenta que le Paga por Ser
Cliente.

Gracias por su Visita.
FirstBank

37 - CAGUAS III

Date Time Transaction
01/12/2019 12:22:36 0092
ML Payment
0000154473 \$458.54

Effective Date:

Detail:
CASH \$0.00
CHECK \$0.00
XFER \$0.00
SOF 037 - 3701867499 \$458.54
FWD \$0.00
OUT \$0.00

Thank you,

FRANCHESKA - 09479
Conozca los Beneficios de la
Cuenta que le Paga por Ser
Cliente.

Gracias por su Visita.

FirstBank

42 - LAS CATALINAS

Date Time Transaction
03/21/2019 09:52:35 0018
ML Payment
0000154473 \$458.54

Effective Date: 03/21/2019

Detail:
CASH \$0.00
CHECK \$0.00
XFER \$458.54
SOF 37 - 3701867499
FWD \$0.00
OUT \$0.00

Thank you,

JENNIFER - 06036
Conozca los Beneficios de la
Cuenta que le Paga por Ser
Cliente.

Gracias por su Visita.

FirstBank

804 - LAS CATALINAS II

Date Time Transaction
03/23/2019 09:51:54 0050
ML Payment
0000154473 \$11.13

Effective Date: 03/23/2019

Detail:
CASH \$0.00
CHECK \$0.00
XFER \$0.00
SOF -
FWD \$11.13
OUT \$0.00

Thank you,

LAURIE - 09438
Conozca los Beneficios de la
Cuenta que le Paga por Ser
Cliente.

Gracias por su Visita.

FirstBank

37 - CAGUAS III

Date Time Transaction
3/23/2019 09:51:08 0048
ML Payment
0000154473 \$447.41

Effective Date:

Detail:
CASH \$0.00
CHECK \$0.00
XFER \$458.54
SOF 037 - 3701867499
FWD \$0.00
OUT \$0.00

Thank you,

LAURIE - 09438
Conozca los Beneficios de la
Cuenta que le Paga por Ser
Cliente.

Gracias por su Visita.
FirstBank

37 - CAGUAS III

> Date Time Transaction
04/01/2019 15:35:25 0361
ML Payment
0000154473 \$458.54

Effective Date: 03/30/2019

Detail:

CASH	\$0.00
CHECK	\$0.00
XFER	\$0.00
SOF -	
FWD	\$461.54
OUT	\$3.00

Thank you,

JENNIFER - 09473
Conozca los Beneficios de la
Cuenta que le Paga por Ser
Cliente.
Gracias por su Visita.

FirstBank

42 - LAS CATALINAS

Date	Time	Transaction
04/01/2019	15:35:07	0360
ML Payment		
0000154473		\$458.54

Effective Date: 03/30/2019

Detail:

CASH	\$920.08
CHECK	\$0.00
XFER	\$0.00
SOF -	
FWD	\$0.00
OUT	\$0.00

Thank you,

JENNIFER - 09473
Conozca los Beneficios de la
Cuenta que le Paga por Ser
Cliente.
Gracias por su Visita.

FirstBank

42 - LAS CATALINAS